

VpAC Vibrio Rule Development Meeting

February 20, 2013

Attendees

In Person: Adam James, Austin Docter, Bill Dewey, Brandy Brush, Cari Franz-West, Darrell Moudry, Dave Steele, David Fyfe, Holly Calvert, Jan Jacobs, Jason Ragan, Jerrod Davis, Jesse DeLoach, Kathleen Nisbet, Laura Wigand, Mark Ballo, Michael Antee, Miranda Ries, Randy Hatch, Richard Lillie, Rick Porso, Scott Grout, Tom Bloomfield, and Vicki Bouvier

Via tele-Conference: Angelo (Andy) DePaola, Annie Fitzgerald, Brian Sheldon, Chris Eardley, Gina Olson, Jared Keefer, Lisa Bishop, Mat Buldis, Ned Therien, Rohinee Paranjpye, Susan Sheldon, and Tony Softich

Purpose

The purpose of the Vibrio parahaemolyticus Advisory Committee (VpAC) is to work with the Department of Health to provide recommendations for consideration in future rule making regarding the Vibrio control plan set forth in WAC 246-282-006. The Department of Health will draft rule language that will be provided to the State Board of Health for review. The State Board of Health has the responsibility of approving any changes or modifications to the WAC, which may or may not include recommendations put forth by the committee.

Meeting Notes

Procedural:

- Reviewed working agreements
- No submittal forms received
- No new subcommittees formed
- Need to reschedule May meeting due to conflicts

Risk Assessment:

- Landings reporting: subcommittee recommends a call in system for reporting landings data
 - o Did not understand that this request would go out to the whole listserv or that it would be all in shell oysters rather than specify those for raw consumption it is for shellstock that could go to raw consumption market, not all in shell oysters (ie clusters)
 - Should target the Vp Committee first, not all harvesters
 - The data collection from the whole industry was premature, need a roadmap on how the data will be used by DOH before industry is comfortable submitting the data
 - Need a clarifying email to be more specific on what oysters are being requested
 - o Trying to keep the reporting simple for harvesters by not straying too far from what is already being reported to DFW
 - DFW reporting is broken, should not build off of that process, can have something transitional but should develop a new form
 - A new form would not be a large burden, companies are already collecting the data
 - Need the form to highlight the months of concern rather than DFW quarters

- Developed a data reporting method, not a form so public disclosure would not be an issue and reduce the burden of reporting given resistance to more reporting/new forms
 - How will exports and post-harvest processed oysters be considered
 - Exports will be discussed by subcommittee, not initially assessed
 - Should be included, we receive illness reports from exports
 - Post-harvest processed oysters should not be in the assessment
 - Could also include pasteurized oysters as a separate line in the form if we wanted to capture this production information
 - Greater granularity in reporting will lead to a greater ability to look for trends and patterns, good in the long run
 - Want a proactive approach to Vibrio management and should focus efforts on that type of approach
- Request to return the issue to subcommittee given the committee's input and lack of agreement
- Inclusion of oysters: subcommittee recommends including all in shell oysters regardless of size
 - Want to reduce industry interpretation of 'intent' and keep the process simple
 - There is an industry standard for sizes
 - If the purpose is to reduce illness, should focus on oysters that cause the greatest illness, not shucked, large, jumbo, etc. which waters down the data
 - Should include all oysters, purpose to free up DOH resources to focus on growers/areas where there is a problem
 - Illnesses occur from all oyster sizes, need to include all in assessment
 - Including large oysters will reduce overall risk, not the purpose of the assessment, want to reduce illnesses so should focus on most risk prone oysters
 - Many have data by size, so easier to report in that format
 - Some do not have production data by size, so it would be burdensome and could not report historical easily
 - Can both be reported, if you have by size report by size if not by total
 - Does DOH get oyster size information as part of their investigation
 - Sometimes it is reported and sometimes it is on tags
 - Could require as part of investigation of company
 - If size is reported separately and linked to illnesses could establish risk by product
- Request to return the issue to subcommittee given the committee's input and lack of agreement
- Acceptable risk: subcommittee recommends working with the FDA number of 1 in 100,000 until landings data is reported and risk can be assessed by DOH
 - Does FDA have plans to revise their ratio?
 - None at this time
 - Need the landings data by growing area and illness data to assess higher risk areas to focus DOH resources
 - Ratio needs to be provided by DOH before proceeding
 - Need the production numbers to provide a ratio
 - Need to develop a timeline, industry has set time to provide landings and then DOH has set time to evaluate a ratio and report back
 - Need to reconcile other factors like underreporting
 - Underreporting in WA is likely less than the CDC's figure of 20
 - Can work from relative risk if landings data is provided
- Serving size: subcommittee recommends a single oyster
 - A serving should be a food industry standard developed by FDA and DOH

- Serving can be how much someone is recommended to eat or how much is needed to make you sick, what are we measuring
- Restaurant serving sizes are all over, but we know it only takes one oyster, so that makes sense to use in the assessment to keep it simple and specific to vibrio
 - If serving size survey data exists for WA we should use it, FDA's serving size data was from a Gulf Coast survey
 - Focus on what dose can make someone sick
- The more oysters consumed the greater the risk, a game off Russian roulette, still just the one that made you sick
- Not sure there is enough added value for determining a serving size to hold up this process, a relative risk assessment would be a good start
- Notes shared from PCSGA Vibrio meeting:
 - A pay to play approach for 2013 where growers have to provide the past three years of landings data to harvest in vibrio control months
 - Report the last three years to get in, then reassess every three years if no/low risk rather than annual reporting
 - Consider reintroducing vibrio classes but focus more on what harvesters can do to reduce risk, where they effective?
 - Responses:
 - Can't know if any interventions are effective without production data
 - Reduce the control months, have it end in August, need reporting by month to document how low the risk is in September as justification to reduce control months
 - Need to establish what can be done now, voluntary pilot, what should be done in 2014, by rule revision
- Update on reporting to date:
 - Poor response from the industry so far
 - May be due to deadline being next week
- Provide guidance to subcommittee:
 - Decide frequency of reporting
 - Monthly
 - If low/no risk maybe reassess frequency
 - Establish probability of risk by grower
 - Determine what should be achieved now vs. in rule
 - Determine how the risk assessment will be used, what would consequences for high risk be/when would closure occur
 - Risk assessment is a statutory requirement now, this will have to go forward in some form
 - Require as part of plan of operations or renewal license
 - Conduct by company not by growing area
 - Look at relative risk for now, address serving size later
 - Develop a grading system based on illnesses/risk
 - Develop a risk threshold
 - Need to deal with privacy concern before company by company assessment, so conduct a growing area assessment for now
 - Need a method to collect landings data, other risk assessment questions follow
- Response requirements: how many companies need to report?
 - Can develop a landings underreporting factor, but bringing in more error

- Can move forward with 80% response rate, not including companies that already suspend summer harvest
- Approach as an issue by operator in growing area and only count illnesses that can be tied to the operator
- Can proceed if industry is fine with reporting
- Multisource illnesses: how are they counted?
 - Some historical multisource illnesses can be assigned to growing areas by PFGE
 - Should have PFGE as a PacRim topic
 - Multisource illnesses are frustrating but should be counted
 - Weight by growing areas implicated
 - Can have finer resolution by only weighting among growing areas with historical vibrio association/common proportions
 - Industry provide the landings data, DOH provide the math
 - Focus on getting landings data from companies implicated in single source illnesses, and multisource illnesses where possible

Environmental Sampling:

- Wants to also consider the size of a growing area and how many operators are present
- Add sampling:
 - Gallagher's Cove to Totten Inlet
 - East and west sides of Samish Bay
- Only one site in Willapa, even though it is a large area because of the low illness history
 - Focus on Bay Center rather than Nahcotta
 - Recently illnesses have been out of Bay Center, most Nahcotta illnesses were due to one operator
- Why is there no sampling in Mystery or Discovery Bay?
 - Not many historical illnesses, and when there is an illness it's typically multisource
- Have 20 set samples and 5 set aside for studies
- General agreement of committee on site list

Environmental Variables: prep for next meeting

- Variables to consider:
 - Tidal exposure
 - Site's unique characteristics
 - Harvest method and management
 - Choice to harvest
 - Issue advisories for when there is likely going to be hot weather with daytime low tides
 - Closures based on heat waves
 - DFW enforcement is lacking in the summer
 - Water temperature as a trigger
 - Preliminary comparisons of water temperature and illnesses seems like 60-65 generally the threshold where illnesses occur
 - Need a method for collecting water temperature at growing depth
 - Issue more data loggers
- What data does the committee want presented:
 - Want staff available, not data
 - Look at studies on whether/how long it takes to purge vibrio:
 - Need to consider if they're feeding, may not be if relayed or in wet storage

- Handling likely changes feeding behavior
 - East Coast wet storage study showed them slow to resume feeding
 - 2001 FDA study of pre/post exposure of undisturbed oysters having dropped levels overnight
 - Should develop best management practices
- Need a baseline before assessing other issues

Subcommittees:

- Risk Assessment:
 - Develop reporting outline and instructions (not a form, but a format for how to report the data)
 - Set a deadline for reporting and help with messaging to industry
 - Prioritize other issues raised by the committee once the landings reporting is figured out

Next Steps:

- Email:
 - Compiled list of topics for subcommittee
 - Doodle poll to reschedule May meeting
 - Doodle poll to schedule subcommittee meeting